

## FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

RQ-2

Donna M. Anderson, Treasurer
National Republican Congressional Committee
- Expenditures
320 First Street
Washington, DC 20003

001 0 9 2802

Identification Number:

C00075820

Reference:

Amended May Monthly Report (4/1/02-4/30/02), received 7/12/02

Dear Ms. Anderson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses in-kind contributions ("donations") from corporations on Schedule H4, supporting Line 21(a) of the Detailed Summary Page (pertinent portions attached). Pursuant to Advisory Opinion 1992-33, the Commission concluded that a "national party committee may accept corporate in-kind donations in connection with fundraising activities" as long as "the federal share of goods or services is paid or transferred to the non-federal account in advance" of the acceptance of the corporate in-kind donations by the federal account.

Advisory Opinion 1992-33 also discloses a detailed method for reporting the receipt and use of in-kind contributions as follows:

- 1. The transfer of the in-kind corporate contribution from the non-federal account to the federal account should be disclosed on Schedule H3. The itemization on Schedule H3 should include the date the Committee received the in-kind contribution, the amount of the contribution and the fundraising event involved.
- 2. The use or expenditure of in-kind corporate contributions should be